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3 BURNS BAIR LLP
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6

7 *Special Insurance Counsel to*
8 *The Official Committee of Unsecured Creditors*

9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 In re
13 THE ROMAN CATHOLIC ARCHBISHOP
14 OF SAN FRANCISCO,
Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

**MONTHLY PROFESSIONAL FEE
STATEMENT FOR BURNS BAIR LLP
FOR MAY 2025**

15 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

16 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP, special insurance counsel to the
17 Official Committee of Unsecured Creditors (the “Committee”), hereby files its monthly professional
18 fee statement for the period May 1, 2025 through May 31, 2025 (the “Fee Period”), pursuant to the
19 *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses on a*
20 *Monthly Basis* (the “Compensation Order”), entered on October 16, 2023 [ECF No. 212]. The total
21 fees and expenses incurred by Burns Bair LLP on behalf of the Committee for the Fee Period are as
22 follows:

Period	Fees	Expenses	Total
May 1, 2025 through May 31, 2025	\$18,279.00 ¹	\$1.29	\$18,280.29
Net Total Allowed Payments this Statement Period (80% of fees and 100% of expenses)	\$14,623.20	\$1.29	\$14,624.49

27 ¹ Burns Bair will contribute ten percent of all fees it receives in this case on a final basis to a settlement trust that is
28 approved as part of a plan of reorganization. As such fees are paid, Burns Bair will hold those funds in a trust account
until a settlement trust is established through a plan of reorganization.

1 Attached hereto at **Exhibit 1** is Burns Bair's itemized billing statement for its fees and
2 expenses billed during the Fee Period. Pursuant to the Compensation Order, the Net Total Allowed
3 Payments detailed in the chart above shall be paid from funds held by the estate of the Debtor, The
4 Roman Catholic Archbishop of San Francisco, unless an objection is filed with the Clerk of the
5 Court and served upon Burns Bair LLP within *14 days after the date of service* of this monthly
6 professional fee statement.

7 Dated: June 30, 2025

BURNS BAIR LLP

8
9 By: /s/ Jesse J. Bair
Jesse J. Bair

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11 *Special Insurance Counsel to the Official*
12 *Committee of Unsecured Creditors*
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EXHIBIT 1

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

**Official Committee of Unsecured Creditors of
Archbishop of San Francisco**

Issue Date : 6/19/2025

Bill # : 01962

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/8/2025	Brian Cawley	Participate in Committee meeting for insurance purposes re case developments and next-steps (1.0); participate in post-meeting call with Committee professionals re pre-petition debtor CVA settlements (.2);	1.20	\$660.00
5/8/2025	Jesse Bair	Review agenda and prepare for Committee meeting (.1); participate in Committee meeting for insurance purposes re case developments and next-steps (1.0);	1.10	\$990.00
5/22/2025	Brian Cawley	Participate in committee meeting for insurance purposes re case developments and next-steps (1.0);	1.00	\$550.00
5/22/2025	Jesse Bair	Review agenda for Committee meeting (.1); participate in Committee meeting for insurance purposes re various case developments, strategy, and next-steps (1.0);	1.10	\$990.00
Totals for Committee Meetings			4.40	\$3,190.00

Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/9/2025	Jesse Bair	Review and respond to correspondence with the debtor, fee examiner, and Committee professionals re next round of interim fee applications (.1);	0.10	\$90.00
5/20/2025	Jesse Bair	Correspond with G. Brown re monthly fee statement (.1);	0.10	\$90.00

5/27/2025	Brenda Horn-Edwards	Draft monthly fee statement and certificate of service (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
5/27/2025	Brenda Horn-Edwards	File and serve monthly fee statement (.2);	0.20	\$68.00
5/27/2025	Jesse Bair	Review and edit monthly fee statement and correspond with B. Horn-Edwards re same (.1);	0.10	\$90.00
Totals for Fee Applications			0.80	\$440.00

Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
5/1/2025	Timothy Burns	Review and respond to correspondence with PSZJ and the debtor re exchange of claims data for mediation (.2); review and respond to correspondence with Committee professionals and mediators re mediation (.2);	0.40	\$448.00
5/1/2025	Jesse Bair	Participate in portion of meet and confer with the debtor re claim reconciliation process (.5); participate in post-meeting call with B. Michael re outcome of same and next-steps (.2);	0.70	\$630.00
5/1/2025	Brian Cawley	Respond to J. Bair request regarding claimant data list (.2);	0.20	\$110.00
5/5/2025	Jesse Bair	Participate in call with T. Burns re case insurance strategy and next-steps re same (.2);	0.20	\$180.00
5/5/2025	Timothy Burns	Participate in conference with J. Bair re insurance strategy and case developments (.2);	0.20	\$224.00
5/6/2025	Timothy Burns	Review PSZJ case update memo (.1);	0.10	\$112.00
5/6/2025	Jesse Bair	Review correspondence with B. Michael and state court counsel re case developments and next-steps (.1);	0.10	\$90.00
5/7/2025	Jesse Bair	Review memorandum and correspondence from state court counsel re allocation of fault issues in connection with opposing the debtor's request for stay protection for non-debtor related entities (.2);	0.20	\$180.00
5/7/2025	Jesse Bair	Correspond with B. Michael and the mediator's office re next mediation session (.1);	0.10	\$90.00
5/7/2025	Jesse Bair	Further analysis re carrier claim count issues in connection with claim reconciliation project with debtor (.1);	0.10	\$90.00
5/7/2025	Timothy Burns	Review case update correspondence from PSZJ to the Committee (.1);	0.10	\$112.00

5/8/2025	Jesse Bair	Participate in call with PSZJ re prior CVA settlement data and related insurance issues (.2); follow-up correspondence with PSZJ re same (.1);	0.30	\$270.00
5/8/2025	Jesse Bair	Review additional correspondence with the debtor and Committee professional re claims reconciliation project (.1);	0.10	\$90.00
5/8/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re insurer intervention in adversary proceeding (.1);	0.10	\$90.00
5/8/2025	Brian Cawley	Respond to J. Bair request regarding claim information (.2);	0.20	\$110.00
5/8/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re intervention issues re adversary proceeding (.2);	0.20	\$224.00
5/8/2025	Timothy Burns	Review correspondence with Committee professionals and the mediators re upcoming mediation session (.2);	0.20	\$224.00
5/9/2025	Jesse Bair	Review settlement documents re prior debtor and insurer CVA settlement (.2); correspond with PSZJ re same (.1); participate in call with the debtor re same and related productions needed (.2); participate in conference with T. Burns re same (.1);	0.60	\$540.00
5/9/2025	Timothy Burns	Review pre-petition settlement materials and related correspondence among Committee professionals re same (.4); conference with J. Bair re same (.1);	0.50	\$560.00
5/9/2025	Timothy Burns	Participate in call with state court counsel re stay adversary proceeding (.2); prepare memo to team re legal issues about insurance impact in connection with same (.2);	0.40	\$448.00
5/15/2025	Timothy Burns	Review and respond to correspondence with the debtor re insurance meeting (.1);	0.10	\$112.00
5/15/2025	Timothy Burns	Prepare for meet and confer with the debtor re various case insurance issues (.2); participate in meet and confer with the debtor re same (1.0); participate in call with J. Bair re outcome of meet and confer and next-step re same (.2);	1.40	\$1,568.00
5/15/2025	Jesse Bair	Prepare for insurance meet and confer with the debtor (.1); participate in meet and confer with the Debtor re various case insurance issues (1.0); participate in call with T. Burns re outcome of meet and confer and insurance next-steps (.2);	1.30	\$1,170.00
5/20/2025	Timothy Burns	Review BB internal correspondence re mediation issues (.1);	0.10	\$112.00

5/20/2025	Timothy Burns	Prepare for mediation session (.1); participate in portion of Zoom mediation session for insurance purposes (2.3); conference with J. Bair re mediation outcome and next-steps (.1);	2.50	\$2,800.00
5/20/2025	Brian Cawley	Begin drafting motion for comfort order re sending insurance demand letters (1.3);	1.30	\$715.00
5/20/2025	Jesse Bair	Prepare for mediation (.1); participate in portion of Zoom mediation session for insurance purposes (2.2); participate in conference with T. Burns re mediation session outcome and next-steps (.1);	2.40	\$2,160.00
5/21/2025	Jesse Bair	Review correspondence with the mediators re follow-up insurance discussion (.1);	0.10	\$90.00
5/22/2025	Timothy Burns	Begin preparing for June mediation session (.3);	0.30	\$336.00
5/22/2025	Jesse Bair	Begin preparing for upcoming insurance mediation meeting (.2);	0.20	\$180.00
5/23/2025	Timothy Burns	Participate in call with state court counsel re mediation issues (.1);	0.10	\$112.00
5/27/2025	Timothy Burns	Review debtor's letter to Judge Montali re discovery dispute with the Committee (.1);	0.10	\$112.00
5/28/2025	Jesse Bair	Review motion to compel order and related correspondence with the Committee (.1);	0.10	\$90.00
5/31/2025	Jesse Bair	Brief review re the Debtor's preliminary injunction motion and correspond with PSZJ re call to discuss insurance issues in connection with same (.2); correspond with B. Cawley re mediator's insurance requests (.1);	0.30	\$270.00
Totals for Insurance Recovery Activities			15.30	\$14,649.00

Total Hours and Fees	20.50	\$18,279.00
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EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
05/27/2025	Postage	\$1.29
Total Expenses		\$1.29

Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	0.50	\$340.00	\$170.00
Brian Cawley	Associate	3.90	\$550.00	\$2,145.00
Jesse Bair	Partner	9.40	\$900.00	\$8,460.00
Timothy Burns	Partner	6.70	\$1,120.00	\$7,504.00

Total Due This Invoice: \$18,280.29

1 Timothy W. Burns (admitted *pro hac vice*)
WI Bar 1068086

2 Jesse J. Bair (admitted *pro hac vice*)
WI Bar 1083779

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8 *The Official Committee of Unsecured Creditors*

9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

11 In re

12 THE ROMAN CATHOLIC ARCHBISHOP
13 OF SAN FRANCISCO,

14 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

CERTIFICATE OF SERVICE

15
16 I, Brenda Horn-Edwards, declare that I am employed in the County of Dane, State of
17 Wisconsin. I am over the age of 18 and not a party to the within action. My business address is 10
18 E. Doty Street, Suite 600, Madison, Wisconsin 53703.

19 On June 30, 2025, I served a true and correct copy of the **Monthly Professional Fee**
20 **Statement for Burns Bair LLP for May 2025** in the manner stated below:



23 TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to
24 controlling General Orders and LBR, the foregoing document was served by the court via NEF and
25 hyperlink to the document. On **June 30, 2025**, I checked the CM/ECF docket for this bankruptcy
26 case or adversary proceeding and determined that the participants on the attached Electronic Mail
27 Notice List will receive NEF transmission at the email address stated.

1 2 3 4 5 6 7	<input checked="" type="checkbox"/> (BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in Dane County, Wisconsin, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. The Honorable Dennis Montali United States Bankruptcy Court Northern District of California 450 Golden Gate Avenue, 16 th Floor San Francisco, CA 94102
8 9	<input checked="" type="checkbox"/> (BY EMAIL) I caused to be served the above-described document by email to the parties indicated on the attached Service List at the email address stated.

10 I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June
11 30, 2025, at Madison, Wisconsin.

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13 /s/ Brenda Horn-Edwards
14 Brenda Horn-Edwards
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ELECTRONIC MAIL NOTICE LIST

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Harris Winsberg on behalf of Interested Party Appalachian Insurance Company
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Yongli Yang on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies
yongli.yang@clydeco.us

LIMITED SERVICE LIST

Description	Name	Address	Fax	Email
*NOA - Request for Notice	A.S.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicecl.com
Debtor's Counsel, Registered ECF User	Amanda L. Cottrell			acottrell@sheppardmullin.com JHerschap@sheppardmullin.com
*NOA Counsel for Junipero Serra High School/Counsel for Marin Catholic High School/Counsel for Riordan High School/Counsel for Salesian Society, Registered ECF User	Binder & Malter, LLP	Robert G Harris 2775 Park Ave Santa Clara, CA 95050		rob@bindermalter.com robertw@bindermalter.com
Registered ECF User	Burns Bair LLP	Jesse Bair Timothy Burns Brian P Cawley		jbair@burnsbair.com kdempski@burnsbair.com tburns@burnsbair.com bcawley@burnsbair.com
*NOA - Request for Notice	C.B.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicecl.com
Corresponding State Agencies	California Department of Tax And Fee Admin	P.O. Box 942879 Sacramento, CA 94279		
The Office of the California Attorney General	California Office of the Attorney General	1300 I St, Ste 1142 Sacramento, CA 95814		
Registered ECF User on behalf of Creditor Victoria Castro	Cheryl C. Rouse	Annette Rolain		rlaw@ix.netcom.com
*NOA - Counsel for Century Indemnity Company, Pacific Indemnity Company, and Westchester Fire Insurance Company	Clyde & Co US LLP	Alexander Potente Jason J Chorley 150 California St, 15th Fl San Francisco, CA 94111	415-365-9801	alex.potente@clydeco.us jason.chorley@clydeco.us
*NOA - Counsel for Certain Underwriters at Lloyd's, London and Certain London Market Companies, Registered ECF User	Clyde & Co US LLP	Catalina J Sugayan 30 S Wacker Dr, Ste 2600 Chicago, IL 60606	312-635-6917	Catalina.Sugayan@clydeco.us
Registered ECF User on behalf of Interested Party Certain Underwriters at Lloyds London and Certain London Market Companies	Clyde & Co US LLP	Nancy Lima Yongli Yang Jason J Chorley Daniel James Michael Norton		Nancy.Lima@clydeco.us yongli.yang@clydeco.us jason.chorley@clydeco.us Robert.willis@clydeco.us daniel.james@clydeco.us michael.norton@clydeco.us
Corresponding State Agencies	Colorado Department of Revenue	1881 Pierce St Lakewood, CO 80214		
*NOA - Attorneys for Companhia De Seguros Fidelidade SA (fka Fidelidade Insurance Company of Lisbon)	Cozen O'Connor	Mary P. McCurdy 388 Market St, Ste 1000 San Francisco, CA 94111		MMcCurdy@cozen.com
*NOA - Counsel for Westport Insurance Corporation, formerly known as Employers Reinsurance Corporation	Craig & Winkelman LLP	Robin D Craig 2001 Addison St, Ste 300 Berkeley, CA 94704		rcraig@craig-winkelman.com
*NOA - Request for Notice	D.R.	Kim Dougherty, Esq. Just Law Collaborative 210 Washington St N Easton, MA 02356	385-278-0287	kim@justicecl.com
Registered ECF User on behalf of Interested Party Daughters of Charity Foundation	David S. Kupetz			david.kupetz@troutman.com

Registered ECF User on behalf of St. Paul Fire and Marine Insurance Co.	Dentons US LLP	Joshua Haevernick 1999 Harrison St, Ste 1300 Oakland, CA 94612	415-882-0300	joshua.haevernick@dentons.com
Registered ECF User on behalf of Appalachian Insurance Company	Dentons US LLP	Patrick C Maxcy John Grossbart 233 S Wacker Dr, Ste 5900 Chicago, IL 60606	312-876-7934	patrick.maxcy@dentons.com john.grossbart@dentons.com
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